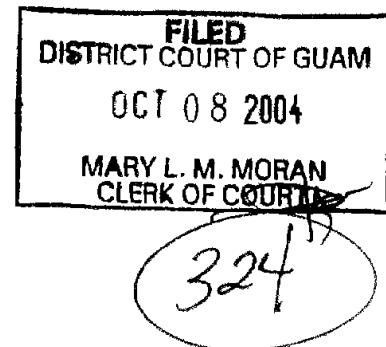


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IN THE DISTRICT COURT OF GUAM

| | | |
|-----------------------------|---|----------------------------------|
| ALAN SADHWANI, LAJU |) | CIVIL CASE NO. 03-00036 |
| SADHWANI, and K. SADHWANI'S |) | |
| INC., a Guam corporation, |) | |
| |) | |
| Plaintiffs, |) | NOTICE OF EX PARTE |
| |) | APPLICATION ON MOTION FOR |
| v. |) | PROTECTIVE ORDER |
| |) | |
| HONGKONG AND SHANGHAI |) | |
| BANKING CORPORATION, LTD., |) | |
| et al, |) | |
| Defendants. |) | |
| |) | |

TO: PLAINTIFFS, and their attorneys, Arriola Cowan & Arriola

NOTICE IS HEREBY GIVEN that on Oct. 8, 2004, at the hour of 4:50 p.m.,

Defendant The Hongkong and Shanghai Banking Corporation Limited ("HSBC") will bring the following Ex Parte Application before the Court.

ORIGINAL

Concurrently with this Ex Parte Application, HSBC has filed a Motion for Protective Order ("Motion"). It is important and urgent that the Ex Parte Application and Motion be heard as soon as possible because Plaintiffs improperly noticed in Guam the depositions of Christopher Page and Magnus Montan, Hong Kong residents, on October 12 and 14, 2004, respectively, as more particularly shown in the supporting memorandum of points and authorities filed herein.

This Ex Parte Application is supported by the pleadings previously filed in this case and by the record before this Court. Further grounds are also set forth in the Motion filed concurrently herewith, the Memorandum of Points and Authorities in support of said Motion, and the documents on file herein all being incorporated herein by this reference. This Ex Parte Application is further supported by the Declarations of Jacques G. Bronze, Richard A. Pipes, Brian W. Gilchrist, Christopher R. Page, and Magnus Montan concurrently filed herewith.

Dated this 10 day of October, 2004.

LAW OFFICES OF BRONZE & TANG
Attorneys for Defendant The Hongkong and Shanghai
Banking Corporation Ltd.

By:


JACQUES G. BRONZE

RAP/nsh